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April 14, 2025

VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan United State Courthouse
500 Pearl Street
New York, New York 10007

Re: *Leadenhall Capital Partners, et al. v. Wander, et al.*, 24-cv-3453-JGK

Dear Judge Koeltl,

We write on behalf of Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investments Fund PLC (together, “Leadenhall”) in connection with the above-captioned matter and in accordance with Your Honor’s Individual Practices § VII.A.2 to respectfully request approval of the redaction of Leadenhall’s April 14, 2025 notice of supplemental authority (the “Notice”) and the sealing of exhibits thereto. Sealed versions of the Notice with proposed redactions highlighted and exhibits are being electronically filed concurrently herewith.

The Notice and the corresponding exhibits reference or contain deposition testimony of Defendants Steven Pasko and Josh Wander taken in the action captioned *777 Partners LLC v. Leadenhall Capital Partners LLP*, No. 24-cv-81143-DMM (S.D. Fla.) (the “Florida Action”), which counsel for those defendants have designated as confidential. The Confidentiality Stipulation and Protective Order (“Protective Order”) governing the Florida Action permits the use of discovery in this Action. Florida Action ECF No. 119 at 4 (“Confidential Information, Highly Confidential Information, and information derived therefrom shall be used solely for purposes of (i) this litigation, including any appeal thereof; (ii) any restructuring, bankruptcy, receivership, rehabilitation, or insolvency proceeding or process involving any of the Parties; or (iii) the litigation commenced by Leadenhall in New York, captioned *Leadenhall Capital Partners LLP et al. v. Wander et al.*, No. 24-cv-3453-JGK (S.D.N.Y., filed May 3, 2024).”).

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On April 14, 2025, counsel for Leadenhall solicited the views of counsel for Defendants Wander and Pasko regarding the necessity of sealing references to and excerpts from their deposition transcripts, in accordance with Your Honor's Individual Practices § VII.A.2. Defendants Wander and Pasko requested that these deposition transcripts be maintained as confidential. Leadenhall therefore submits this letter motion so as to allow Defendants Wander and Pasko the opportunity to move for a sealing order pursuant to Your Honor's Individual Practices § VII.A.2. Leadenhall has notified Defendants Wander and Pasko that, within three days, they must file a letter explaining the need to seal or redact these documents.

Respectfully submitted,

/s/ Leigh M. Nathanson

Leigh M. Nathanson